

Exhibits  
A — C  
and Ex X

Exhibits A and A2  
12-6096  
(FSH)

EXHIBIT A1  
COLLECTION LETTER TO  
DEBORAH ROSS

And

EXHIBIT A2  
COLLECTION LETTER TO  
JUBILEE CONSTRUCTION

**PANTERIS & PANTERIS, LLP**

**Attorneys at Law**

333 Sylvan Avenue, Suite 201  
Englewood Cliffs, NJ 07632

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Tel: (201) 435-0536  
Fax: (201) 603-6586

April 17, 2012

DEBORAH ROSS

PO Box 847

Alloway NJ 08001

Re: Creditor: American Express Bank Fsb

Our File #: 00-23693

Amount of Claim: \$5,090.03

Dear Ms. Ross :

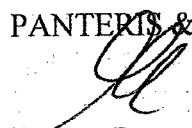
Please be advised that this office represents the above named creditor, as its debt collector. Our client has turned over your account in the amount indicated above to our office for collection. Please forward a check or money order for the amount of \$5,090.03 to the address indicated above.

Unless you notify our office in writing within thirty (30) days after receipt of this letter that you are disputing the validity of this debt or any portion of it, the debt will be assumed to be valid by this office. If you do notify us of a dispute, within the thirty (30) day period, then we will obtain a verification of the debt and mail it to you. Upon your written request within the thirty (30) day period, we will provide you with the name and address of the original creditor if it is different from the current creditor.

**THIS COMMUNICATION IS FROM A DEBT COLLECTOR. THIS LETTER IS AN ATTEMPT TO COLLECT A DEBT, AND ANY INFORMATION WE OBTAIN WILL BE USED FOR THAT PURPOSE.**

Very truly yours,

PANTERIS & PANTERIS, LLP

  
George Panteris

GP:sg

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**Attorneys at Law**

333 Sylvan Avenue, Suite 201  
Englewood Cliffs, NJ 07632

-----  
Tel: (201) 435-0536  
Fax: (201) 603-6586

April 17, 2012

Jubilee Construction  
PO Box 847  
Alloway NJ 08001

Re: Creditor: American Express Bank Fsb  
Our File #: 00-23693  
Amount of Claim: \$5,090.03

Dear Sir/Madam:

Our office has been retained by the above named creditor for the purpose of collecting its claim against Jubilee Construction. We must insist that payment be made immediately to our office for the amount indicated above. If you have any questions concerning this claim or wish to discuss a possible resolution, please call the undersigned at the above telephone number.

If we do not hear from you immediately or if we do not receive payment within the next ten days, we will have no other alternative but to commence legal action and seek recovery of the outstanding balance, plus interest and court costs.

Very truly yours,

PANTERIS & PANTERIS, LLP

George Panteris  
GP:sg

Exh B

Exhibits B1 and B2  
12-6096  
(FSH)

EXHIBIT B1

NOTICE OF DISPUTE, VERIFICATION, &  
VALIDATION LETTER FOR  
DEBORAH ROSS

And

EXHIBIT B2

NOTICE OF DISPUTE, VERIFICATION, &  
VALIDATION LETTER FOR  
JUBILEE CONSTRUCTION

Deborah Ross  
P.O. Box 847  
Alloway NJ 08001

May 5, 2012

Pantresis & Panteris, LLP  
333 Sylvan Avenue, Suite 201  
Englewood Cliffs, NJ 07632

George Panteris,

Thank you for your recent inquiry. This is not a refusal to pay, but a notice that your claim is disputed.

This is a request for validation made pursuant to the Fair Debt Collection Practices Act. Please complete and return the attached disclosure request form.

Please be advised that I am not requesting a "verification" that you have my mailing address, I am requesting a "validation:" that is, competent evidence that I have some contractual obligation to pay you.

You should also be aware that sending unsubstantiated demands for payment through the United States Mail System might constitute mail fraud under federal and state law.

Your failure to satisfy this request within the requirements of the Fair Debt Collection Practices Act will be construed as your absolute waiver of any and all claims against me, and your tacit agreement to compensate me for costs and attorneys fees.

Sincerely,



**CREDITOR DISCLOSURE STATEMENT**

Name and Address of Collector (assignee): \_\_\_\_\_

\_\_\_\_\_

Name and Address of Debtor: \_\_\_\_\_

\_\_\_\_\_

Account Number(s): \_\_\_\_\_

What are the terms of assignment for this account? You may attach a facsimile of any records relating to such terms.

\_\_\_\_\_

\_\_\_\_\_

Have any insurance claims been made by any creditor or assignee regarding this account?  
Yes/no

Has the purported balance of this account been used in any tax deduction claim? Yes / no

Please list the particular products or services sold by the collector to the debtor and the dollar amount of each:

\_\_\_\_\_

\_\_\_\_\_

Upon failure or refusal of collector to validate this collection action, collector agrees to waive all claims against the debtor named herein and pay debtor for all costs and attorney fees involved in defending this collection action.

X \_\_\_\_\_

Authorized signature for Collector

\_\_\_\_\_  
Date

Please return this completed form and attach all assignment or other transfer agreements that would establish your right to collect this debt. Your claim cannot be considered if any portion of this form is not completed and returned with the required documents. This is a request for validation made pursuant to the Fair Debt Collection Practices Act. If you do not respond as required by this law, your claim will not be considered and you may be liable for damages for continued collection efforts.

Jubilee Construction  
P.O. Box 847  
Alloway NJ, 08001

May 5, 2012

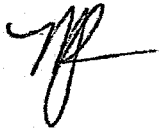
Panteris & Panteris, LLP  
333 Sylvan Ave. Suite 201  
Englewood Cliffs, NJ 07632

George Panteris

I am in receipt of your correspondence attempting to collect a debt.(copy of letter enclosed) I dispute the alleged debt in its entirety. I demand that you provide me with the name and address of the original creditor, the name and address of the current creditor, and complete validation of the amount of the alleged debt.

Sincerely,

Jubilee Construction

A handwritten signature in black ink, appearing to be a stylized 'J' or 'JP', located below the printed name 'Jubilee Construction'.



exhc

Exhibits C  
12-6096  
(FSH)

EXHIBIT C  
NOTICE AND LAWFUL NOTIFICATION OF  
INTENT TO SUE

Deborah Ross and Michael J. Ross

Sent First Class and Certified Mail # 7011-0470-0000-7857-6018

August 13, 2012

To: PANTERIS & PANTERIS, LLP  
George Panteris, Esq  
333 Sylan Avenue, Suite 201  
Englewood Cliffs, NJ 07632

**NOTICE AND LAWFUL NOTICATION OF  
INTENT TO SUE**

It has come to our attention that you are attempting to acquire our assets, money and/or other financial resources by attempting to obtain a judgment against us in a case identified as DOCKET NO. DC-001213-12. We recognize this as an unjust and inappropriate business operation of yours – an unlawful attempt at acquiring the money of another. We do not owe you any money nor do we owe AMERICAN EXPRESS BANK, FSB any money. Your activities in this matter are void of any claim against us. It appears to us that nevertheless, you are determined to acquire our monetary resources. We wholly object to your activities and we will not participate nor contract with you in any way in these matters.

Therefore, we are writing you this letter to notice you and give you lawful notification that we intend to sue you Federal Court. We will sue you pursuant the Constitution of the United States of America and the laws of the United States, such as Title 18 – Promotion of Fictitious Obligation, the Fair Debt Collection Practices Act, and claims for fraud. We will seek a punitive damage award because we are aware that your activities stand to be quite profitable however, they are unlawful just the same.

You have until August 23, 2012 if you would like to resolve this matter. Even so, based upon your activities thus far, we do not expect that you would contact us or otherwise respond and are moving forward. Consider this fair notice, lawful notification and your opportunity to cure before you are served our Complaint. This letter will be an Exhibit in our Complaint so that the court will know we have given you fair notice before we sue you.

Act Accordingly,

Contact Info. 609-217-8143 E-mail: [saiah5417@comcast.net](mailto:saiah5417@comcast.net)

Deborah Ross

*Deborah Ross 8/13/12*

Michael J. Ross (Signee for Jubilee Construction, L.L.C.)

*Michael J. Ross 8/13/12*

EXH X

EXH X

RECEIVED AND FILED

JUL 27 2012

SUPERIOR COURT OF NEW JERSEY  
SALEM COUNTY SPECIAL CIVIL PART

**EXHIBIT X: COPY OF  
REFUSED CERTIFIED LETTERS  
FRONT AND BACK**

Jubilee Construction  
P.O. Box 847  
Alloway, NJ 08001

CERTIFIED MAIL™



7011 0470 0000 7857 8552

Panteris & Panteris, LLP

RETURN RECEIPT  
REQUESTED

OC S

☐ INSUFFICIENT ADDRESS  
☐ ATTEMPTED NOT KNOWN  
☐ NO SUCH NUMBER/STREET  
☐ NOT DELIVERABLE AS ADDRESSED  
☐ OTHER

5-15  
5-20

RETURN TO SENDER  
**RIS**

0763232732

Handwritten signature

Handwritten signature

Deborah Ross  
P.O. Box 847  
Alloway NJ 08001

CERTIFIED MAIL™



7011 0470 0000 7857 8739

Panteris & Panteris, LLP

OC S

☐ INSUFFICIENT ADDRESS  
☐ ATTEMPTED NOT KNOWN  
☐ NO SUCH NUMBER/STREET  
☐ NOT DELIVERABLE AS ADDRESSED  
☐ OTHER

5-15  
5-20

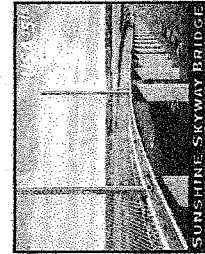
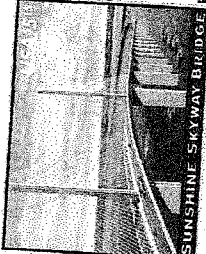
RETURN TO SENDER  
**RIS**

RETURN RECEIPT  
REQUESTED

0763232732

Handwritten signature

Handwritten signature



PLACE STICKER AT TOP OF ENVELOPE TO THE RIGHT  
OF THE RETURN ADDRESS. SOLD AT POSTAGE.

SENDER: COMPLETE THIS SECTION		COMPLETE THIS SECTION ON DELIVERY	
<p>■ Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.</p> <p>■ Print your name and address on the reverse so that we can return the card to you.</p> <p>■ Attach this card to the back of the mailpiece, or on the front if space permits.</p> <p>1. Article Addressed to:</p> <p><i>Panteris &amp; Panteris, LLP</i>  <i>333 Sylvan Ave, Suite 201</i>  <i>Englewood Cliffs, NJ</i>  <i>07632</i></p> <p>2. Article Number (Transfer from service label)            7011 0470 0000 7857 8852</p> <p>PS Form 3811, February 2004</p>		<p>A. Signature  <input checked="" type="checkbox"/> Agent  <input type="checkbox"/> Addressee</p> <p>B. Received by (Printed Name) C. Date of Delivery</p> <p>D. Is delivery address different from item 1? <input type="checkbox"/> Yes            If YES, enter delivery address below: <input type="checkbox"/> No</p> <p>3. Service Type  <input checked="" type="checkbox"/> Certified Mail  <input type="checkbox"/> Registered  <input type="checkbox"/> Insured Mail  <input type="checkbox"/> C.O.D.  <input type="checkbox"/> Express Mail  <input type="checkbox"/> Return Receipt for Merchandise</p> <p>4. Restricted Delivery? (Extra Fee) <input type="checkbox"/> Yes</p>	

102588-02-M-1540

Domestic Return Receipt

PS Form 3811, February 2004

PLACE STICKER AT TOP OF ENVELOPE TO THE RIGHT  
OF THE RETURN ADDRESS. SOLD AT POSTAGE.

SENDER: COMPLETE THIS SECTION		COMPLETE THIS SECTION ON DELIVERY	
<p>■ Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.</p> <p>■ Print your name and address on the reverse so that we can return the card to you.</p> <p>■ Attach this card to the back of the mailpiece, or on the front if space permits.</p> <p>1. Article Addressed to:</p> <p><i>Panteris &amp; Panteris, LLP</i>  <i>333 Sylvan Ave, Suite 201</i>  <i>Englewood Cliffs, NJ</i>  <i>07632</i></p> <p>2. Article Number (Transfer from service label)            7011 0470 0000 7857 8739</p> <p>PS Form 3811, February 2004</p>		<p>A. Signature  <input checked="" type="checkbox"/> Agent  <input type="checkbox"/> Addressee</p> <p>B. Received by (Printed Name) C. Date of Delivery</p> <p>D. Is delivery address different from item 1? <input type="checkbox"/> Yes            If YES, enter delivery address below: <input type="checkbox"/> No</p> <p>3. Service Type  <input checked="" type="checkbox"/> Certified Mail  <input type="checkbox"/> Registered  <input type="checkbox"/> Insured Mail  <input type="checkbox"/> C.O.D.  <input type="checkbox"/> Express Mail  <input type="checkbox"/> Return Receipt for Merchandise</p> <p>4. Restricted Delivery? (Extra Fee) <input type="checkbox"/> Yes</p>	

102588-02-M-1540

Domestic Return Receipt

PS Form 3811, February 2004



RECEIVED AND FILED  
AMERICAN EXPRESS BANK, FSB  
JUL 27 2012  
SUPERIOR COURT OF NEW JERSEY  
SALEM COUNTY SPECIAL CIVIL PART

Plaintiff  
SALEM COUNTY SPECIAL CIVIL PART

SUPERIOR COURT OF NEW JERSEY  
LAW DIVISION, SPECIAL CIVIL PART  
Se, 92 Market Street  
Salem, NJ 08079  
DOCKET NO: DC-001213-12

v.  
Jubilee Construction, L.L.C. and Deborah Ross  
Defendant(s)

Deborah Ross and Jubilee Construction, L.L.C.  
P.O. Box 847  
179 Ernest Garton Rd  
Alloway, NJ 08001  
609-217-8143

PANTERIS & PANTERIS, LLP  
By: George Panteris, Esq.  
333 Sylvan Avenue, Suite 201  
Englewood Cliffs, NJ 07632  
Telephone No. (201)435-0536  
Alleged Attorney for Plaintiffs

**AFFIDAVIT OF PHONE CALL TO  
AMERICAN EXPRESS BANK, FSB**

sta

Debor

upon to a

1. On Ju

Construc

Express Ban

2. Affiant(s) spoke to

Carol, ID No. 18522,

3. Customer Service Represe

Panteris, Esq. and Panteris &

American Express Bank, FSB an

complaint against Deborah Ross and

In the county of Salem  
In the State of New Jersey